From: ent: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]

Friday, March 02, 2012 2:24 PM

To: Cc: SHEWCZYK Susan

Subject:

Popotnik, Frank RE: I will be in the field / talk Tuesday

Attachments:

02242012VeoliaReply.jpg; 02122012ltrtoVeolia.jpg; 02122012ltrtoVeolia1.jpg

Thanks for the scan sent to me.

I have attached a two-page letter sent from WTI to Veolia, and a one-page letter sent from Veolia back to WTI. Both were provided to me today from WTI as part of our on-going investigation into the 12/17/2011 incident and fatality.

I will be at my desk on Tuesday at between 3-5pm Ohio time which is 12-2 pm Oregon time. My phone again is 330-385-8421.

To follow up on the unmanifested waste report sent by WTI, it would be helpful to understand:

- how the waste streams are generated (when does the facility determine material is a waste, and under what circumstances/reasons);
- do materials/wastes arrive from other facilities in the country and WahChang Oregon determines whether recyclable or waste (and how);
- how materials/wastes are segregated, stored, labeled, sampled prior to arrival in Oregon and while in Oregon to ensure there is no mix-up of materials with waste;
 - any actual sample/analysis information especially recent information;
- whether anything (labeling, procedures, etc) have changed recently;
- whether any incidents have occured on-site in Oregon including near-misses (where an incident was averted by some action, so not "reportable" to an agency but perhaps an internal report was generated).

Why don't we touch base Tuesday pm?

Thanks for your help in figuring out how this material was shipped as non-haz waste in contrast to the unmanifested waste report.

From: SHEWCZYK Susan [SHEWCZYK.Susan@deq.state.or.us]

Sent: Friday, March 02, 2012 4:58 PM

To: Tarka, Michelie

Subject: I will be in the field

All next week. I have taken some of the files home to review.

From:

Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]

nt: fo: Thursday, March 15, 2012 11:39 AM

Cc:

SHEWCZYK Susan Popotnik, Frank

Subject:

FW: waste being rejected back to WahChang, Oregon

Categories:

Red Category

Susan, I apologize for not including you. I misplaced your email address. I will keep you informed as to the actual date of rejection back to Wah Chang. I would appreciate hearing about the results of your inspection. thanks

From: Tarka, Michelle

Sent: Thursday, March 15, 2012 1:25 PM To: schanilec.kevin@epamail.epa.gov

Cc: Popotnik, Frank

Subject: waste being rejected back to WahChang, Oregon

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From:

Kevin Schanilec [Schanilec.Kevin@epamail.epa.gov]

Thursday, March 15, 2012 1:14 PM

ľo:

Tarka, Michelle

Cc: Subject: Popotnik, Frank; FULLER Brian; SHEWCZYK Susan Re: waste being rejected back to WahChang, Oregon

Thanks Michelle - sorry I missed your call.

Once ATI-Wah Chang indicates that they are in fact going to take custody of the waste, and further that they will be shipping it back to Oregon, then this is something we can explore. I assume it would be manifested as a D001 and/or D003 hazardous waste from the heritage-WTI facility.

I have alerted the State of Oregon, who would presumably be in the position to do this sort of communication to the company. Brian Fuller and Susan Shewczyk of Oregon DEQ are cc'd to this email - please keep us all appraised if/when you get any information about if or when the waste will get shipped.

Thanks!

Kevin

Kevin Schanilec
Compliance Officer, Air/RCRA Compliance Unit
US Environmental Protection Agency, Region 10
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Jeattle, WA 98101
(206) 553-1061
(206) 553-8509 (fax)
schanilec.kevin@epa.gov

"Tarka, Michelle" ---03/15/2012 10:25:12 AM---Kevin, I was informed today by Carrie Beringer of WTI that WahChang has been asked (for the second t

From: "Tarka, Michelle" < Michelle.Tarka@epa.state.oh.us To: Kevin Schanflec/R10/USEPA/US@EPA
Cc: "Popotnik, Frank" < frank.popotnik@epa.state.oh.us Date: 03/15/2012 10:25 AM

Subject: waste being rejected back to WahChang, Oregon

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From:

Kevin Schanilec [Schanilec.Kevin@epamail.epa.gov]

ોnt:

Thursday, March 15, 2012 1:06 PM

10:

FULLER Brian SHEWCZYK Susan

Cc: Subject:

RE: Fw: waste being rejected back to WahChang, Oregon

Also, Wah Chang has apparently not responded to WTI-Heritage that they are agreeing to take the waste back. If they do, we also don't know that Wah Chang plans to bring it back to Albany, So, perhaps we/you need to wait and see what Wah Chang's plan is, and go from there?

Thanks - Kevin

Kevin Schanilec
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FULLER Brian ---03/15/2012 11:52:49 AM---Kevin I'm not clear on what you are asking DEQ to do.

rom: FULLER Brian < FULLER.Brian@deq.state.or.us >

J: Kevin Schanllec/R10/USEPA/US@EPA, FULLER Brian <<u>FULLER.Brian@deq.state.or.us</u>>, SHEWCZYK Susan <<u>SHEWCZYK.Susan@deq.state.or.us</u>> Date: 03/15/2012 11:52 AM

Subject: RE: Fw: waste being rejected back to WahChang, Oregon

Kevin

I'm not clear on what you are asking DEQ to do.

Thanks

From: Kevin Schanilec Sent: 3/15/12 11:11 AM

To: FULLER.Brian@deq.state.or.us; SHEWCZYK.Susan@deq.state.or.us;

Subject: Fw: waste being rejected back to WahChang, Oregon

Susan/Brian:

This from the State of Ohio: she is requesting that Wah Chang get it to their Oregon facility as fast as possible, without stopping at a transfer station or other point of delay, so that this waste doesn't hurt anyone else.

are you inclined/.able to do that?

Thanks - Kevin

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---- Forwarded by Kevin Schanilec/R10/USEPA/US on 03/15/2012 11:10 AM -----

From: "Tarka, Michelle"

To: Kevin Schanilec/R10/USEPA/US@EPA

Cc: "Popotnik, Frank"
Date: 03/15/2012 10:25 AM

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From:

Kevin Schanilec [Schanilec.Kevin@epamail.epa.gov]

nt:

Thursday, March 15, 2012 12:59 PM

ro: Cc: FULLER Brian SHEWCZYK Susan

Subject:

RE: Fw: waste being rejected back to WahChang, Oregon

Hi Brian:

Ohio is asking if there is a way to get Wah Chang to commit to getting the waste back to their facility (or perhaps to another TSD) in the quickest manner possible, such that potential exposure/ harm is minimized. This would include not stopping at one or more 10-day transfer facilities.

Thanks - Kevin

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rom: FULLER Brian <FULLER.Brian@deg.state.or.us>

To: Kevin Schanlec/R10/USEPA/US@EPA, FULLER Brian < FULLER.Brian@deg.state.or.us >, SHEWCZYK Susan < SHEWCZYK.Susan@deg.state.or.us > Date: 03/15/2013 11:53 AM

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Subject: RE: Fw: waste being rejected back to WahChang, Oregon

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Thanks

From: Kevin Schanilec Sent: 3/15/12 11:11 AM

To: FULLER.Brian@deq.state.or.us; SHEWCZYK.Susan@deq.state.or.us;

Subject: Fw: waste being rejected back to WahChang, Oregon

Susan/Brian:

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Are you inclined/.able to do that?

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---- Forwarded by Kevin Schanilec/R10/USEPA/US on 03/15/2012 11:10 AM -----

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To: Kevin Schanilec/R10/USEPA/US@EPA

Cc: "Popotnik, Frank"
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Phone: 412.442.4147 | Fax: 412.442.4194

www.depweb.state.pa.us

om: Welsh, Gary L. [mailto:Gary.Welsh@ATImetals.com]

-ent: Thursday, March 15, 2012 1:37 PM

To: Minor, Paul Cc: Matsukas, Paul S Subject: DEP Visit

Paul,I wanted to let you know that I will not be in the office on Friday. I will be back in the office Monday and will give you a call at that time. In the interim I have attached the 2011 Hazardous Waste Report for our Rochester Facility. Paul mentioned that you were inquiring as to our transformer disposal and previous Hazardous Waste disposal. Our goal has always been to operate our facilities hazardous waste free. To that end we use no wet type transformers and to my knowledge have never had a need for hazardous waste disposal at this facility.

Have a great weekend

Gary

From: Matsukas, Paul S

Sent: Tuesday, March 13, 2012 1:11 PM

To: Welsh, Gary L. Subject: DEP Visit

Gary – Contact information attached. Paul Minor has a few follow up questions to be answered and asked if you could contact him Friday.

Thank you, Paul



Paul Matsukas Monaca/Rochester Plant Manager

ATI Precision Finishing
499 Delaware Ave
Rochester, PA 15074
www.ATIPrecisionFinishing.com

T: 724-775-1664 Ext. 224

F: 724-775-1668 C: 724-480-5159

From:

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Date: 03/15/2012 11:52 AM

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---- Forwarded by Kevin Schanilec/R10/USEPA/US on 03/15/2012 11:10 AM ----

From: "Tarka, Michelle"

To: Kevin Schanilec/R10/USEPA/US@EPA

Cc: "Popotnik, Frank"
Date: 03/15/2012 10:25 AM

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From:

Kevin Schanilec [Schanilec.Kevin@epamail.epa.gov]

ent:

Wednesday, March 21, 2012 10:15 AM

10:

SHEWCZYK Susan

Subject:

RE: WTI releasing a compilation of info on 12/17 inci

40 originally. They processed 6 and had the over-pressure problems. They then started to process 2 more, and had the accident. The other 32 were then quarantined.

Burn Bary Bridge

til et sam griften grent sen.

18 3

ine describe

. .

Kevin

Kevin Schanilec
Compliance Officer, Air/RCRA Compliance Unit
US Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, MS-OCE-127
Seattle, WA 98101
(206) 553-1061
(206) 553-8509 (fax)
schanilec.kevin@epa.gov

SHEWCZYK Susan ---03/21/2012 10:07:27 AM---Kevin, was it a total of 38 drums and 32 left? From: Kevin Schanilec [mailto:Schanilec.Kevin@epamail]

From: SHEWCZYK Susan <SHEWCZYK.Susan@deq.state.or.us>
To: Kevin Schanliec/R10/USEPA/US@EPA
)ate: 03/21/2012 10:07 AM
Subject: RE: WTI releasing a compilation of info on 12/17 inci

Kevin, was it a total of 38 drums and 32 left?

From: Kevin Schanilec [mailto:Schanilec.Kevin@epamail.epa.gov]

Sent: Wednesday, March 21, 2012 10:05 AM

To: Tarka, Michelle

Cc: Popotnik, Frank; SHEWCZYK Susan

Subject: Re: WTI releasing a compilation of info on 12/17 inci

Thanks Michelle - this will be very good information to get.

I assume that the remaining 32 drums of waste is still sitting at WTI?

Thanks - Kevin

(evin Schanilec Compliance Officer, Air/RCRA Compliance Unit US Environmental Protection Agency, Region 10

Agenda

- a) Discuss ATIs history of fires/explosions from zirconium
- b) Which drums were involved in the explosion: 55gal or 30 gal.
 - a. Where did they come from
 - b. Why were they overpaked
 - c. Albany knew they were in poor condition (overpaked)
- c) What is the difference between metal fines, grinding swarf, saw swarf, felt swarf, Zi dust?
- d) Discuss what AL solutions, Precision Finishing, and WahChang does. Can we determine by their processes where the waste came from? By photos, drum labeling, etc.
- e) Track the movement of drums in question from generation to explosion.
 - a. Emails from Veolia and ATI to WTI
 - b. Letter from Lee Weber to ODEQ
 - c. Letter from Lee Weber to WTI
- f) What other wastes were transported and disposed of using Albany's profile. Any from West Vir or Ohio? Why did Albany use that profile when it came from PF Pennsyl
- g) Discuss WTI findings

415B

From:

Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]

nt: Tuesday, March 27, 2012 4:55 AM

FULLER Brian; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; Paul Minor 10:

Cc: Popotnik, Frank

RE: most recent info regarding WahChang waste Subject:

I am adding Paul Minor to this email string.

May I point out that this letter (from ATI) is in regards to the swarf generated at the Albany Oregon plant? This letter does not discuss wastes generated at other ATI locations.

The waste that caused the death at WTI was manifested as being generated in Albany Oregon, but was actually manufactured in Rochester PA. The material from Rochester was usually sent for recycling (to AL Solutions in West Virginia, the site of an explosion/fire and 3 deaths in December 2010 as a result of zirconium metal). AL Solutions is still shut down, to my knowledge.

Was it was 30 gd.

At some time in early 2011, a total of 40 drums of this material was shipped from Rochester PA to Albany Oregon. ATI

Oregon determined the material "was not recyclable" (due to having no outlet anymore?) and decided to ship this material to WTI. why was it sent from term to allowy - was it many

WTI's interviews of ATI personnel during Jan and Feb 2012 provided the information that ATI had never before shipped Oregon sent material that was NOT in accordance with what WTI was expecting. The material was ~100 % zirconium, was contained the blend expected from Albany. Rochester material to WTI under their Oregon profile (prior to this Dec 2011 incident). As a side note, that means ATI not the blend expected from Albany.

why wasn't it manifested?

The ATI letter also mentions (2nd paragraph) that they have a long history of managing grinding swarf without incident.

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As has been pointed out - the photos of the AL Solutions fire that are all over the internet clearly show a fire fighter standing next to a pallet with black drum with a bright pink band painted around the center ring. This is, to my understanding, the way that ATI Rochester designates their material. If so, it places ATI Rochester material at the scene - ash for copy of an explosion/fire causing 3 deaths. That incident occurred Dec 2010.

May I suggest that we include West Virginia Dept of Env Protection, in our multi-state investigation? I am curious as to whether West Virginia DEP investigation was able to pinpoint a group of generators whose materials were being processed at the time of the explosion. This should have been something discovered by AL Solutions by their investigation. Even if they couldn't say for sure what material caused the fire, they should be able to say what generators had sent materials that were most likely involved. The photo is rather strong evidence that ATI Rochester material was being processed at AL Soln at the time of the fire.

The material that caused the death at WTI was generated (according to ATI Albany Oregon) in early 2011.

I believe that these incidents are related. I believe the material was generated at Rochester PA. There was no longer a recycling outlet for it after the AL Soln incident. ATI Albany kept it on their site for a while...maybe it dried out while sitting around...then ATI Oregon decided to dispose of it and sent it to WTI. At that point, ATI overpacked the containers "due to their poor condition" and added oil to the inside of each drum and filled the void space between the drums and overpacks with more oil. What did they know that they were not telling anyone about? The material was dried out and combustible? They downgraded the DOT shipping description from 4.2 to 4.1 to send it to WTI.

WTI has a statement from ATI Oregon that says something along the lines of "we knew it was too dangerous to split, so we overpacked....".

The other issue is the statement by ATI in their letter that they were unaware that WTI was repackaging the material. I believe this is inaccurate. As part of their contract with WTI, ATI was told to send the material in no more than 400 pound charges. On several occasions prior to this incident, ATI sent material in larger sizes and WTI repacked the

material without incident. Again - this is material supposedly generated in Oregon. I believe ATI Oregon knew there were issues with this material. They might have told the broker, Veolia, but it was not relayed to WTI. If it had been, WTI would have said that they could not feed that charge size intact to the incinerator. It would have been like feeding a bomb into the incinerator. I believe ATI knew.

WTI is contending that based upon their investigation, this last shipment was different from the usual Albany material. It was not in accordance with the profile set up for the material from Oregon, it was the first time the waste came overpacked and covered in oil, and it was $\sim 100\%$ zirconium. As stated above, Oregon has admitted it actually came from PA, and was not the same material that Oregon had always shipped to WTI.

It would be very helpful to have all parties brought up to speed on the investigations at various facilities, including West Virginia DEP. I am still available all day Friday, Ohio time 7:00 am till 5 pm.

From: FULLER Brian [FULLER.Brian@deq.state.or.us]

Sent: Monday, March 26, 2012 1:26 PM

To: Tarka, Michelle; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov

Cc: Popotnik, Frank

Subject: RE: most recent info regarding WahChang waste

Hello, Attached is a letter from Wah Chang to Oregon DEQ regarding their zirconium swarf. Wah Chang has indicated that they would like to sample the 32 drums in Ohio prior to moving them off site. I'm available most of the day on Friday the 30th for a call. Thanks

Brian Fuller
Manager - Hazardous and Solid Waste Programs
Oregon DEQ - Western Region
541-687-7327 - Office
541-501-3349 - Mobile
http://www.oregon.gov/DEQ/

Messages to and from this e-mail address may be available to the public under Oregon Public Records Law.

From: Tarka, Michelle [mailto:Michelle.Tarka@epa.state.oh.us]

Sent: Friday, March 23, 2012 11:16 AM

To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov

Cc: FULLER Brian; Popotnik, Frank

Subject: most recent info regarding WahChang waste

The purpose of this email is to share the most recent information that I have obtained from WTI regarding the 32 drums of metal fines from WahChang.

As you are all aware, WTI has informed WahChang and Veolia that the 32 drums must be removed from WTI's property. WTI has now, most recently, informed WahChang and Veolia that the waste must off WTI property "on or before April 5th" per __, Carrie Beringer of WTI.

It appears that WahChang is attempting to forstall the return of these drums as long as possible. However, keeping or treating the drums here is not an option.

I requested a copy of recent correspondence between WTI and WahChang regarding how the waste will be managed. I was provided the attached series of emails between WTI personnel and ATI WahChang/Frank Hamilton and Veolia/Eric Feist.

There are 5 pages (WaChWasteShipEmail, Email1, Email2, Email3, Email4).

I can be available for a conversation on Thursday 3/29 and/or Friday 3/30 if you would like to discuss this. Please give me a time frame in advance if possible so I can arrange my schedule to accomodate.

From:

Minor, Paul [pminor@pa.gov]

nt:

Tuesday, March 27, 2012 5:41 AM

10:

Tarka, Michelle; FULLER Brian; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov

Cc: Popotnik, Frank

Subject:

RE: most recent info regarding WahChang waste

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Paul J. Minor | Field Operations Supervisor Department of Environmental Protection Southwest Regional Office 400 Waterfront Dr | Pittsburgh, PA 15222 Phone:412.442.4147 | Fax: 412.442.4194 www.depweb.state.pa.us

From: Tarka, Michelle [mailto:Michelle.Tarka@epa.state.oh.us]

Sent: Tuesday, March 27, 2012 7:55 AM

To: FULLER Brian; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; Minor, Paul

Cc: Popotnik, Frank

'ubject: RE: most recent info regarding WahChang waste

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http://www.oregon.gov/DEQ/

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There are 5 pages (WaChWasteShipEmail, Email1, Email2, Email3, Email4).

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Please give me a time frame in advance if possible so I can arrange my schedule to accomodate.

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Cc: Popotnik, Frank
Subject: drum weights into WTI

Attachments: RcvdDrumWtsTrailerInfo1.jpg; RcvdDrumWtsTrailerInfo.jpg

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This is a list of the containers on the trailer being held here at WTI, with the containers from the 12/17 incident. Shortly after the incident, WTI requested to remove all these containers from their warehouse and place them on a trailer in an outside area that would be more safe. Ohio EPA agreed to this due to the safety issue.

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r_cont_wt.4ge

Shipments Received in ARTS For Date 12/13/2011 to 12/13/2011

Page no: 2

trailer list page 2052

Date: 02/17/2012 Time: 08:15:32

Authorization Manifest WStream PCod Quote Trk/Cont Sample IdWt lbs Gal Waste Type Pick List Pq Ln S Typ Size Total for customer: 81543 Count 40 Pounds: 35,052 Total for Bulk: Pounds - Gal: Count: Total for Containers: Count: 40 Pounds 35,052

TOTAL FOR REPORT:

CONFIDENTIAL

35.052

* plus - 1001368804

4 1001368805

Splits created on 12/14 but

did not end up Red to incin

these splits were from another
previous - drum

(not the incident dum)

the splits are on the evidence trailer

+ So is # 1001366827

that leaves 32 drums

CONFIDENTIAL

(ist of containers on the trailer (remaining from incident)

r_cont_wt.4ge

Shipments Received in ARTS

For Date 12/13/2011 to 12/13/2011

Date: 02/17/2012 Time: 08:15:32

printed on this date of Revol by ED

Authorization WStream

Manifest

Page no: 1

WStream	PCod Que	te P	y	Ln	S	Тур	Size	Trk/Cont	Sample IdWt 1bs	Gal	Waste Type	Pick List
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	8073 374	210 0	01	001	s	DM	85	1001366824	875	100	solid	REJE1
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5 —	→8073 374	210 00	01	001	A	DM	85	1001366832	913	100%	solid	Luenanes
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	8073 374	210 00	1	001 8	S	DM	85	1001366845	896		solid	REJE1
	8073 374	210 00	1	001 5	3	DM	85	1001366846	930		solid	REJE1
	8073 374	210 00	1	001 8	S :	DM	85	1001366847	888		solid	REJE1
	8073 374	210 00	1	001 8	3	DM	85	1001366848	892		solid	REJE1
	8073 374	210 00	1	001 5	3	DM	85	1001366849	903		solid	REJE1
	8073 3742	210 00	1	001 5	3 1	DM	85	1001366850	925		solid	REJE1
	8073 3742	210 00	1	001 8	3 1	DM	85	1001366851	821		solid	REJE1
	8073 3742	10 00	1	001 8	3 3	DM	85	1001366852	932		solid	REJE1
	8073 3742	10 00	1	001 5	3 1	DM	85	1001366853	952		solid	REJE1
	8073 3742			001 5			85	1001366854	947		solid	REJE1
	8073 3742			001 8		DM	85	1001366855	923		solid	REJE1
	8073 3742			001 8		DM	85	1001366856	936		solid	REJE1
	8073 3742			001 S			85	1001366857	841		solid	REJE1
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May I suggest that we include West Virginia Dept of Env Protection, in our multi-state investigation? I am curious as to whether West Virginia DEP investigation was able to pinpoint a group of generators whose materials were being processed at the time of the explosion. This should have been something discovered by AL Solutions by their investigation. Even if they couldn't say for sure what material caused the fire, they should be able to say what generators d sent materials that were most likely involved. The photo is rather strong evidence that ATI Rochester material was being processed at AL Soln at the time of the fire.

The material that caused the death at WTI was generated (according to ATI Albany Oregon) in early 2011.

I believe that these incidents are related. I believe the material was generated at Rochester PA. There was no longer a recycling outlet for it after the AL Soln incident. ATI Albany kept it on their site for a while...maybe it dried out while sitting around...then ATI Oregon decided to dispose of it and sent it to WTI. At that point, ATI overpacked the containers "due to their poor condition" and added oil to the inside of each drum and filled the void space between the drums and overpacks with more oil. What did they know that they were not telling anyone about? The material was dried out and combustible? They downgraded the DOT shipping description from 4.2 to 4.1 to send it to WTI.

WTI has a statement from ATI Oregon that says something along the lines of "we knew it was too dangerous to split, so we overpacked....".

The other issue is the statement by ATI in their letter that they were unaware that WTI was repackaging the material. I believe this is inaccurate. As part of their contract with WTI, ATI was told to send the material in no more than 400 pound charges. On several occasions prior to this incident, ATI sent material in larger sizes and WTI repacked the material without incident. Again - this is material supposedly generated in Oregon. I believe ATI Oregon knew there were issues with this material. They might have told the broker, Veolia, but it was not relayed to WTI. If it had been, WTI would have said that they could not feed that charge size intact to the incinerator. It would have been like feeding a bomb into the incinerator. I believe ATI knew.

WTI is contending that based upon their investigation, this last shipment was different from the usual Albany material. It was not in accordance with the profile set up for the material from Oregon, it was the first time the waste came verpacked and covered in oil, and it was $\sim 100\%$ zirconium. As stated above, Oregon has admitted it actually came rom PA, and was not the same material that Oregon had always shipped to WTI.

It would be very helpful to have all parties brought up to speed on the investigations at various facilities, including West Virginia DEP. I am still available all day Friday, Ohio time 7:00 am till 5 pm.

From: FULLER Brian [FULLER.Brian@deg.state.or.us]

Sent: Monday, March 26, 2012 1:26 PM

To: Tarka, Michelle; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov

Cc: Popotnik, Frank

Subject: RE: most recent info regarding WahChang waste

Hello, Attached is a letter from Wah Chang to Oregon DEQ regarding their zirconium swarf. Wah Chang has indicated that they would like to sample the 32 drums in Ohio prior to moving them off site. I'm available most of the day on Friday the 30th for a call. Thanks

Brian Fuller
Manager - Hazardous and Solid Waste Programs
Oregon DEQ - Western Region
541-687-7327 - Office
541-501-3349 - Mobile
http://www.oregon.gov/DEQ/

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From: Tarka, Michelle [mailto:Michelle.Tarka@epa.state.oh.us]

Sent: Friday, March 23, 2012 11:16 AM

To: SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov

c: FULLER Brian; Popotnik, Frank

bject: most recent info regarding WahChang waste

The purpose of this email is to share the most recent information that I have obtained from WTI regarding the 32 drums of metal fines from WahChang.

As you are all aware, WTI has informed WahChang and Veolia that the 32 drums must be removed from WTI's property. WTI has now, most recently, informed WahChang and Veolia that the waste must off WTI property "on or before April 5th" per Carrie Beringer of WTI.

It appears that WahChang is attempting to forstall the return of these drums as long as possible. However, keeping or treating the drums here is not an option.

I requested a copy of recent correspondence between WTI and WahChang regarding how the waste will be managed. I was provided the attached series of emails between WTI personnel and ATI WahChang/Frank Hamilton and Veolia/Eric Feist.

There are 5 pages (WaChWasteShipEmail, Email1, Email2, Email3, Email4).

I can be available for a conversation on Thursday 3/29 and/or Friday 3/30 if you would like to discuss this.

Please give me a time frame in advance if possible so I can arrange my schedule to accomodate.

From: Tarka, Michelle [Michelle.Tarka@epa.state.oh.us]

ent: Tuesday, March 27, 2012 4:55 AM

FULLER Brian; SHEWCZYK Susan; schanilec.kevin@epamail.epa.gov; Paul Minor

Cc: Popotnik, Frank

Subject: RE: most recent info regarding WahChang waste

I am adding Paul Minor to this email string.

May I point out that this letter (from ATI) is in regards to the swarf generated at the Albany Oregon plant? This letter does not discuss wastes generated at other ATI locations.

The waste that caused the death at WTI was manifested as being generated in Albany Oregon, but was actually manufactured in Rochester PA. The material from Rochester was usually sent for recycling (to AL Solutions in West Virginia, the site of an explosion/fire and 3 deaths in December 2010 as a result of zirconium metal). AL Solutions is still shut down, to my knowledge.

At some time in early 2011, a total of 40 drums of this material was shipped from Rochester PA to Albany Oregon. ATI Oregon determined the material "was not recyclable" (due to having no outlet anymore?) and decided to ship this material to WTI.

WTI's interviews of ATI personnel during Jan and Feb 2012 provided the information that ATI had <u>never before</u> shipped Rochester material to WTI under their Oregon profile (prior to this Dec 2011 incident). As a side note, that means ATI Oregon sent material that was NOT in accordance with what WTI was expecting. The material was ~100 % zirconium, not the blend expected from Albany.

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